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18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**
26 **DISTRICT OF NEVADA**

27 U.S. BANK, N.A., AS TRUSTEE,
28 SUCCESSOR IN INTEREST TO
29 WACHOVIA BANK NATIONAL
30 ASSOCIATION, AS TRUSTEE FOR GSAA
31 HOME EQUITY TRUST 2005-11, ASSET-
32 BACKED CERTIFICATES, SERIES 2005-
33 11,

34 Plaintiff,

35 vs.

36 FIDELITY NATIONAL TITLE GROUP,
37 INC., et al.,

38 Defendants.

Case No.: 2:21-cv-00339-GMN-VCF

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO MOTION FOR REMAND [ECF
No. 7] AND MOTION FOR FEES AND
COSTS [ECF No. 8]**

(Third Request)

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
3 stipulate and agree as follows:

- 4 1. On February 26, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District
5 Court, Case No. A-21-830198-C [ECF No. 1-1];
- 6 2. On February 26, 2021, Chicago Title filed a Petition for Removal to this Court [ECF
7 No. 1];
- 8 3. On March 30, 2021, U.S. Bank filed a Motion for Remand [ECF No. 7] and Motion
9 for Costs and Fees [ECF No. 8];
- 10 4. On April 9, 2021, Chicago Title filed a Stipulation and Proposed Order extending
11 Chicago Title’s time to respond to the Motion for Remand and Motion for Fees and
12 Costs to May 5, 2021;
- 13 5. On May 3, 2021, Chicago Title filed a Stipulation and Proposed Order extending
14 Chicago Title’s time to respond to the Motion for Remand and Motion for Fees and
15 Costs to June 2, 2021
- 16 6. Chicago Title’s deadline to respond to U.S. Bank’s Motion for Remand and Motion
17 for Costs and Fees is currently June 2, 2021;
- 18 7. Chicago Title’s counsel is requesting an extension until June 16, 2021, to file its
19 response to the pending Motion for Remand and Motion for Costs and Fees;
- 20 8. Chicago Title requests a further extension of time to respond to the Motion for
21 Remand and Motion for Costs and Fees to afford Chicago Title additional time to
22 respond to the legal arguments set forth in U.S. Bank’s motions;
- 23 9. U.S. Bank does not oppose the requested extension;
- 24 10. This is the third request for an extension which is made in good faith and not for
25 purposes of delay;

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1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through
3 and including June 16, 2021.

4
5 Dated: May 27, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

10 Dated: May 27, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair
12 KEVIN S. SINCLAIR
13 Attorneys for Defendant CHICAGO TITLE
INSURANCE COMPANY

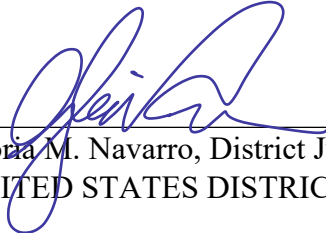
14 Dated: May 27, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Christina V. Miller
16 DARREN T. BRENNER
17 CHRISTINA V. MILLER
18 Attorneys for Plaintiff U.S. BANK
19 NATIONAL ASSOCIATION

20 **IT IS SO ORDERED.**

21 Dated this 27 day of May, 2021

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25 Gloria M. Navarro, District Judge
26 UNITED STATES DISTRICT COURT
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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

